

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

ePLUS, INC.,

Civil Action No. 3:09-cv-620 (JRS)

Plaintiff,

v.

LAWSON SOFTWARE, INC.,

Defendant.

DECLARATION OF KURT REASONER

I, Kurt Reasoner, declare as follows:

1. I make this declaration on my own information, knowledge, and belief.
2. I am the System Director of Enterprise Applications for Providence Health & Services in Renton, Washington. My job duties include management and deployment of our enterprise resource planning software as well as management of software systems operating across and common to the entire organization, including our internet, intranet, information technology management and Collaboration systems.
3. I prepared a declaration on February 14, 2011, regarding Providence's use of Lawson's RSS procurement system. As detailed in that declaration, if Providence had been forced to switch from Lawson's RSS system to another provider, Providence would have to go through an RFP process, which has historically taken Providence approximately a year to complete.

4. Attached hereto as Exhibit A is a true and correct summary of the estimated internal costs that Providence would likely have to incur to replace the RSS product. This does not take into consideration of licensing and services costs of a third party vendor.

5. Exhibit A also does not take into consideration the opportunity costs related to the project manager, lead analyst, application director, technical director, application administrator, application analyst, and the other employees who are required to stop other projects to take on the responsibilities to implement a new procurement product.

6. Providence is in the process of changing from Lawson's RSS software to the RQC software. Providence is currently in the deployment stage of the RQC product with a target go-live date of September 25, 2011.

7. Attached hereto as Exhibit B is a true and correct summary of the estimated internal costs that Providence will likely incur during the phase of implementing the RQC product. From the time of download, full deployment to all 27 hospitals and other facilities is estimated at four months.

8. Exhibit B also does not take into consideration the opportunity costs of the employees listed in the document to take on other work.

I declare under the penalty of perjury the foregoing is true and correct to the best of my knowledge.

Date: September 19, 2011


Kurt Reasoner